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BEFORE THE POSTAL RATE COMMISSION WASHINGTON, D.C. 20268-0001

Nov 19 4 39 PM '01

POSTAL BATE SUBHISSION
OFFICE OF THE SEGRETARY

POSTAL RATE AND FEE CHANGES, 2001

Docket No. R2001-1

RESPONSES OF THE UNITED STATES POSTAL SERVICE TO INTERROGATORIES OF MAJOR MAILERS ASSOCIATION REDIRECTED FROM WITNESS MOELLER (MMA/USPS-T28-1 and 2)

The United States Postal Service hereby provides its responses to the following interrogatories of Major Mailers Association: MMA/USPS-T28-1 and 2, filed on November 5, 2001.

The interrogatories have been redirected from witness Moeller to the Postal Service for response.

Each interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr. Chief Counsel, Ratemaking

Michael T. Tidwell

475 L'Enfant Plaza West, S.W. Washington, D.C. 20260–1137 (202) 268–2998; Fax –5402 November 19, 2001

RESPONSES OF THE UNITED STATES POSTAL SERVICE TO INTERRGATORIES OF MAJOR MAILERS ASSOCIATION REDIRECTED FROM WITNESS MOELLER

MMA/USPS-T28-1 Please provide, for the Test Year Before Rates, an exhibit similar to Exhibit USPS-28A but with attributable costs using the Commission's cost methodology rather than the Postal Service's proposed cost methodology. Please provide the source for the attributable costs.

RESPONSE:

The USPS-T-28 exhibits are in USPS-LR-J-138. The requested exhibit may be produced by entering the costs provided in USPS-LR-J-75, Volume F, Table E.

RESPONSES OF THE UNITED STATES POSTAL SERVICE TO INTERRGATORIES OF MAJOR MAILERS ASSOCIATION REDIRECTED FROM WITNESS MOELLER

MMA/USPS-T28-2 Please provide, for the Test Year After Rates, an exhibit similar to Exhibit USPS-28B but with attributable costs using the Commission's cost methodology rather than the Postal Service's proposed cost methodology. Please provide the source for the attributable costs.

RESPONSE:

The USPS-T-28 exhibits are in USPS-LR-J-138. The requested exhibit may be produced by entering the costs provided in USPS-LR-J-75, Volume H, Table E, as revised on October 31, 2001. (See Notice of USPS of Filing of Errata to USPS-LR-J-75, October 31, 2001).

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the Rules of Practice.

Michael T. Tidwell

475 L'Enfant Plaza West, S.W. Washington, D.C. 20260–1137 November 19, 2001